

**ASTRAZENECA PHARMA INDIA LIMITED**  
**WHISTLE- BLOWING POLICY AND PROCEDURES**

**Introduction**

AstraZeneca is committed to the highest standards of moral and ethical integrity, transparency and propriety in its work. Towards this end, the company encourages employees and directors with bona fide concerns over core values, probity and integrity, legal compliance, violation of the AstraZeneca Code of Conduct or good SHE practices to come forward and express their bonafide concerns without fear of victimization, harassment or retribution.

**Aim and Scope**

This policy aims to -:

- Provide avenues for employees and directors to raise serious concerns regarding ethical values, probity and integrity, legal compliance, violation of the AZ Code of Conduct or good SHE practices.
- Redress any harassment or victimization in work place including sexual harassment.
- Enable management to be informed at an early stage to take corrective action and avoid any complication at a later date
- Develop a culture of openness, accountability and total integrity.
- Reassure employees and directors that they would be fully protected from harassment or victimization for whistle blowing in good faith

**Safeguards**

The company will ensure the following safeguards to employees and directors making such disclosures provided –

- the disclosure is made bonafide and in good faith;
- the employee reasonably and bonafide believes that the information or allegations he / she discloses is substantially true and;
- the employee is not acting for any personal gain

• **Prevention of harassment or victimization**

The employee and directors would be protected against actions such as dismissal, demotion, disciplinary action or punishment or any form of harassment or victimisation, discrimination, bias, or other unfair employment practices directly or indirectly attributable to whistle-blowing. Any action as aforesaid or threat of any such action would be treated as a serious disciplinary offence and liable to serious disciplinary action.

• **Sexual harassment**

In case of any complain of sexual harassment, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 will be followed.

- **Confidentiality**

The company recognises that some individuals would wish to raise a concern in confidence. The Company will do its best to protect the identity of any employee who whistle-blows and wishes to remain anonymous as also the confidentiality of the concern raised in confidence.

- **Reckless / Irresponsible Allegations**

Investigations are costly, time-consuming and potentially damaging events and the company will not encourage allegations that are reckless, irresponsible, malicious or where made for ulterior purposes. In case of repeated frivolous complaints being filed by a director or an employee, the Company may take suitable action against the concerned director or employee including reprimand.

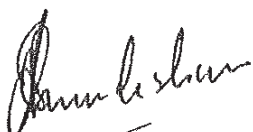
- **Procedure for handling Whistle Blowing incidents:**

The Company would investigate any such reported incident and take appropriate action.

#### PROCEDURES FOR RAISING CONCERNS

The company offers the employee and directors multiple options to raise and get answers to questions about integrity issues and to raise any concerns about what might be a violation:

1. Locally	<ul style="list-style-type: none"> <li>• Consider contacting             <ul style="list-style-type: none"> <li>- the line manager or any other Senior Manager within AstraZeneca India.</li> <li>- VP - HR,</li> <li>- VP – Legal &amp; Company Secretary,</li> <li>- Local Compliance Officer</li> <li>- The Managing Director</li> <li>- Chairman, Audit Committee.</li> </ul> </li> </ul>
2. Contact the Code of Conduct Confidential Helpline	At <a href="http://www.azethics.com">www.azethics.com</a>
3. Contact Global Compliance	At <a href="mailto:globalcompliance@astrazeneca.com">globalcompliance@astrazeneca.com</a>

Approved by:   
Sanjay Mirdeshwar  
Managing Director

Date: May 15, 2015

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